

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: STEWARD HEALTH CARE SYSTEM LLC, et al., Debtors.¹	§ § § § § § § §	Chapter 11 Case No. 24-90213 (CML) (Jointly Administered) Re: Docket No. 2939
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**STIPULATION AND AGREED ORDER EXTENDING DEADLINE
UNDER SALE ORDER TO FILE TERMINATING COST REPORT**

This stipulation and agreed order (the “**Stipulation and Agreed Order**”) is entered into by and among (i) the United States of America, on behalf of the Centers for Medicare & Medicaid Services (the “**United States**”) and (ii) Steward Health Care System LLC and its debtor affiliates, as debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the “**Debtors**” and, together with the United States, the “**Parties**”). The Parties hereby stipulate and agree as follows:

RECITALS

WHEREAS, on May 6, 2024 (the “**Petition Date**”), the Debtors commenced the above-captioned voluntary cases (the “**Chapter 11 Cases**”) under chapter 11 of title 11 of the United States Code (the “**Bankruptcy Code**”) in the United States Bankruptcy Court for the Southern District of Texas (the “**Bankruptcy Court**”).

WHEREAS, on October 16, 2024, the Bankruptcy Court entered the *Order (I) Authorizing and Approving (A) the Sale of Hillside Rehabilitation Hospital and Trumbull Regional Medical Center Free and Clear of Liens, Claims, Encumbrances, and Interests, and*

¹ A complete list of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://restructuring.ra.kroll.com/Steward>. The Debtors’ service address for these chapter 11 cases is 2811 McKinney Avenue, Suite 300, Dallas, Texas 75204.

(B) the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; and
(II) Granting Related Relief (Docket No. 2939) (the “**Sale Order**”).²

WHEREAS, pursuant to paragraph 17(g) of the Sale Order, the Debtors are required to file a terminating cost report with respect to their operations at Trumbull Regional Medical Center (“**Trumbull**”) by 150 days following the Closing Date.

WHEREAS, the sale of the Debtors’ interests in Trumbull closed on October 30, 2024. Accordingly, the deadline for the Debtors to file their terminating cost report for Trumbull is March 31, 2025.

WHEREAS, the Parties have agreed to enter into and jointly submit this Stipulation.

It is hereby **ORDERED** that:

1. This Stipulation and Agreed Order shall be binding and effective upon the date this Stipulation and Agreed Order is approved by the Bankruptcy Court.

2. The Debtors’ deadline under the Sale Order to file the terminating cost report for Trumbull is hereby extended by 30 days to through and including **April 30, 2025**; *provided* that such deadline may be further extended by CMS through email from its counsel to Debtors’ counsel without further order of this Court.

3. This Stipulation and Agreed Order may be executed in counterparts, each of which shall be deemed an original, but all of which together shall constitute one and the same instrument, and it shall constitute sufficient proof of this Stipulation and Agreed Order to present any copies, electronic copies, or facsimiles signed by the Parties here to be charged.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Sale Order.

4. The undersigned who executes this Stipulation and Agreed Order by or on behalf of each respective Party represents and warrants that he or she has been duly authorized and empowered to execute and deliver this Stipulation and Agreed Order on behalf of such Party.

5. This Stipulation and Agreed Order shall not be modified, altered, amended, or vacated without the written consent of all Parties hereto or by further order of the Bankruptcy Court.

6. The Bankruptcy Court shall retain sole and exclusive jurisdiction over all matters related to this Stipulation and Agreed Order.

Dated: _____, 2025

Christopher M. Lopez
United States Bankruptcy Judge

STIPULATED AND AGREED TO BY:

Dated: March 27, 2025

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